

## **Responses to Public Comments on ARB's Pilot Project Proposals February 4, 2005**

This document presents responses to comments received on the ARB's ChERRP Pilot Project Proposals. Comments are briefly summarized here to provide the reader with context for the responses. Full versions of these comments are available elsewhere on the Cal/EPA's environmental justice website.

### **Summary of Comments Received at October 19<sup>th</sup> 2004 Workshop**

- Several Communities Indicated Interest
- Need for Partnerships
- Suggestions on Advisory Committee Role in Pilot Projects

### **Responses to Comments Received at October 19<sup>th</sup> 2004 Workshop**

#### **Several Communities Indicated Interest**

For the pilot project, some of the key selection criteria were multiple sources of diesel emissions impacting the community, as well as a concentration of industrial and commercial air pollution sources. In addition, it is important to have strong community support. The communities of Wilmington, Mira Loma and Commerce were selected for this pilot project based on this criteria and stakeholder suggestions.

#### **Need for Partnerships**

ARB will partner with community groups, the South Coast Air Quality Management District, other Cal/EPA agencies, other local agencies, and other stakeholders to complete these projects.

#### **Suggestions on Advisory Committee Role in Pilot Projects**

Issues regarding the role of the Advisory Committee will be addressed by Cal/EPA.

### **Summary of Written Comments from CCEEB dated November 26, 2004**

- Need for Community Specific Emission Inventory
- Identification of Regulatory and Data Gaps
- Need to Identify Information Gaps Regarding Cumulative Impact Studies, Protocols and Tools
- Editorial Comments

### **Responses to Written Comments from CCEEB dated November 26, 2004**

#### Need for Community Specific Inventory

Existing emission inventory data for each area will be used, and we will collect additional data as needed for the project. When the focus is on a specific source category, a detailed inventory will be developed for that category while there may be less attention to categories not being examined in detail. In other areas where very extensive information is already available, we will use it to explore tools for assessing cumulative risk. Each community will have community specific issues that will allow us to evaluate different risk reduction strategies as appropriate.

#### Identification of Regulatory Gaps

Early emphasis of the project will include collection of data, identification of data, and regulatory gaps. We anticipate that as we work with local community groups, we will identify regulatory and data gaps specific to those communities. As we do this, we will also move forward on the projects that can begin immediately to reduce exposure and risk.

#### Need to Identify Information Gaps Regarding Cumulative Impact Studies, Protocols and Tools

The multi-media cumulative impact tools are in the early stages of development. As the Office of Environmental Health Hazard Assessment develops the working definition for multi-media cumulative impacts and as the tools for these assessments are available, we will apply them to our pilot project as appropriate.

#### Editorial Comments

Most of the editorial comments we received from CCEEB have been incorporated into the latest version of ARB's proposal. For example, under suggested goals we changed the goal of "Involve the community and local agencies, throughout the process" to "Involve the community, local agencies, and other stakeholders throughout the process".

### **Summary of Written Comments from CCEEB dated January 31, 2005**

- Identify Regulatory Gaps
- Need for Performance Indicators
- Consult with OEHHA on Cumulative Impact Tools
- Timeline Inconsistencies
- Identify Mitigation Strategies
- Editorial Changes

### **Responses to written Comments from CCEEB dated January 31, 2005**

#### Identify Regulatory Gaps

We anticipate that as we work with local community groups, we will identify regulatory and data gaps specific to those communities. However, in the meantime we will also move forward on the projects that can begin immediately to reduce exposure and risk.

#### Need for Performance Indicators

We are not including performance indicators at this time because there are a variety of proposed projects for which comparison of risk levels may or may not be an appropriate indicator. As we finalize the projects, with stakeholder input we will identify appropriate performance indicators.

#### Consult with OEHHA on Cumulative Impact Tools

The multi-media cumulative impact tools are in the early stages of development. As the Office of Environmental Health Hazard Assessment develops the working definition for multi-media cumulative impacts and as the tools for these assessments are available, we will apply them to our pilot project as appropriate.

#### Timeline Inconsistencies

The Project Work Plan and Timeline has been modified to reflect the timeline proposed in the Cal/EPA Action Plan.

#### Identify Mitigation Strategies

In the pilot projects, we will be exploring and evaluating innovative approaches to determine their feasibility for reducing emissions in the respective community. It may not be appropriate to include cost effectiveness in this phase.

#### Editorial Changes

We incorporated editorial changes suggested by CCEEB regarding regulatory gaps and including “other stakeholders” in the latest version of the pilot project proposal.